

## REMARKS

This is intended as a full and complete response to the Office Action dated November 17, 2003, having a shortened statutory period for response set to expire on February 17, 2004. Claims 27-42 are pending in the application. Claims 30, 32 and 33 have been amended to better define an aspect of the present invention. Claims 43 and 44 have been added. Please reconsider the claims pending in the application for reasons discussed below.

### Examiner Interview

Applicant would like to thank the Examiner for conducting the interview on January 26, 2004. The arguments and amendments herein are presented in accordance with the substance of the interview to place the application in condition for allowance.

### Rejections Under 35 U.S.C. § 102

Claims 27-29 stand rejected under 35 U.S.C. § 102(a) as being anticipated by WO 98/22690. The Examiner states that WO 98/22690 discloses an expandable connection between two slotted tubulars. The Examiner further states that the connection is formed by co-joining the tubulars via a solid sleeve connector (16) to form a connection region having non-overlapping slots, wherein the connection region includes ends of tubulars forming the connection.

Applicant respectfully traverses the rejection. WO 98/22690 discloses a connection assembly having two axially separated slotted tubulars (18 and 19) with a connector (16) holding them together. If the connector (16) is solid, then WO 98/22690 does not disclose two *co-joined* slotted tubulars as required by claim 27. On the other hand, if the connector (16) is slotted (as the specification suggests it could be), then the connection between the slotted tubulars (16 and 18) would necessarily result in overlapping slots in the area of the connection as illustrated in Figure 3 of the reference. Therefore, WO 98/22690 does not teach, show, or suggest an expandable connection

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between two slotted tubulars, the connection formed by co-joining the tubulars to form a connection region having non-overlapping slots, wherein the connection region includes ends of the tubulars forming the connection, as recited in claims 27-28. Furthermore, WO 98/22690 does not teach, show, or suggest an expandable connection for wellbore tubulars comprising a substantially cylindrical member disposed adjacent the inter-engaged first and second connection members, wherein the substantially cylindrical member and the first and second connection members form a connection region having non-overlapping slots, as recited in claim 29. Therefore, Applicants believe claims 27-29 are in condition for allowance, and respectfully request allowance of the same.

Claims 30-40 and 42 stand rejected under 35 U.S.C. § 102(b) as being anticipated by WO 96/37681. The Examiner states that WO 96/37681 discloses an expandable connection comprising an expandable tubular having a first end and a second end, the first end having a first connection member. The Examiner further states that the expandable connection further includes a second connection member, the first and second connection members being inter-engageable along a first substantially cylindrical surface. Furthermore, the Examiner states that the second end is disposed adjacent a portion of the inter-engaged first and second connection members along a second substantially cylindrical surface (the surfaces of 35 and 39 or 37 and 34).

Applicant respectfully traverses the rejection. WO 96/37681 generally discloses a connector assembly for connecting expandable slotted tubing. The connector assembly includes a first part having surfaces (34 and 39) that engage a second part having surfaces (35 and 37) to form an expandable connection. As discussed in the Examiner interview, the surfaces (35 and 39 or 37 and 34) are frustoconical rather than cylindrical surfaces. Therefore, WO 96/37681 does not teach, show, or suggest an expandable connection for expandable tubulars comprising an expandable tubular having a first end, the first end having a first connection member, a second connection member, the first and second connection members being inter-engageable along a first substantially cylindrical surface and a second tubular member disposed adjacent a portion of the inter-engaged first and second connection members along a second

substantially cylindrical surface, as recited in amended claims 30-33.

Furthermore, WO 96/37681 does not teach, show, or suggest an expandable connection for expandable tubulars comprising a first expandable tubular having a first connection member, a second expandable tubular having a second connection member, wherein the first and second connection members are inter-engageable along a first substantially cylindrical surface and a third connection member disposed adjacent a portion of the inter-engaged first and second connection members along a second substantially cylindrical surface, as recited in claims 34-40 and 42. Therefore, Applicant believes claims 30-40 and 42 are in condition for allowance, and respectfully requests allowance of the same.

#### **Allowable Subject Matter**

Claim 41 stands objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Accordingly, Applicant has rewritten claim 41 as new claim 43. Therefore, Applicant believes new claim 43 is in condition of allowance, and respectfully requests allowance of the same.

#### **New Claim**

Claim 44 has been added to better define an aspect of the present invention. Applicant submits that no new matter was added. Furthermore, Applicant believes that the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention disclosed in new claim 44. Therefore, Applicant believes new claim 44 is in condition for allowance, and respectfully requests allowance of the same.

### **CONCLUSION**

The Examiner is invited to call the Applicant to discuss the response.

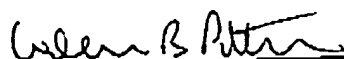
The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action.

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Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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